

DATE OUT: 11/22/2013

SUBJECT: **PRODUCT CHEMISTRY REVIEW OF:** TGAI []; MUP []; EUP [X]
BARCODE NO.: 415720 **REG./FILE SYMBOL NO.:** 60061-128
PRODUCT NAME: ValvTect Marine Premium Diesel Additive with BioGuard Microbiocide
MRID NO: 492232-01,-02, 492286-01
COMPANY NAME: Kop-Coat, Inc **ACTION CODE:** 676

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TO: Julia Stokes, CRM
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INTRODUCTION:

With this resubmission, in response to our review dated 06/18/2012 (DP # 401224), the registrant provided revised Confidential Statement of Formula (CSF), a basic formulation, dated 07/26/2013, a revised draft label, punch dated 07/31/2013; MRID Nos. 492232-01,-02, 492286-01, and a justification letter dated 08/29/2013. The registrant is requesting reregistration of the product ValvTect Marine Premium Diesel Additive with BioGuard Microbiocide, EPA Reg. No. **60061-128**.

FINDINGS:

1. EPA Reg. No. **60061-128** is an end-use product containing the active ingredient [REDACTED]. A label claim nominal concentration is provided for its two components: 4-(2-Nitrobutyl) **Morpholine** (21.8%) and 4,4-(2-Ethyl-2-nitrotrimethylene) **Dimorpholine** (1.35%), and other inert ingredients content of 76.85%. The product is a pesticide to prevent bacterial growth in diesel fuel. The product is produced by a non-integrated system.
2. As requested in Finding No. 2 of the previous review, the solvent issue was harmonized. Typo errors noted were also corrected. The nominal concentration of the components of the active ingredient agrees with that on the label and meets the requirements of PR Notice 91-2. The certified limits for the active and inert ingredients are acceptable in accordance with 40 CFR §158.350 (b)(2). The CSF for the basic formulation is now acceptable.
3. It might be concluded that the information regarding the Product Identity and Composition and the Description of the materials used to produce the product as was requested in Finding Nos. 3 and 4 of the previous review is now provided in the revised CSF. The requirements of Guidelines 830.1550 and 830.1600 are now satisfied.

4. As requested in Finding No. 5 of the previous review, the data concerning the Oxidation/Reduction Chemical Incompatibility, Explodability, Miscibility, and Dielectric Breakdown Voltage are now provided in MRID Nos. 492286-01, 492232-02, and the certification letter.

- a. MRID No. 492286-01. GRN 830.6314, Oxidation/Reduction Chemical Incompatibility.

The material was tested at room temperature 20.8°C and placed in direct contact with the water, powder zinc, ammonium persulfate and monoammonium phosphate for evaluation of incompatibility. No temperature rise greater than 5°C and gas evolution were observed for all substances. The product is compatible with common oxidizing and reducing agents. The requirements of Guideline 830.6314 are satisfied.

- b. As per certification letter, none of the components in the subject product present an explosion hazard. The requirements of Guideline 830.6316 are satisfied.

- c. MRID No. 492232-02. GRN 830.6319, Miscibility.

The material was tested with the nonpolar organic solvents and found to miscible with Hexanes, Mineral Spirits and Diesel fuel. The requirements of Guideline 830.6319 are satisfied.

- d. As per certification letter, the product is not utilized in the vicinity of electrical equipment and electrical conduits. The test is not applicable for GRN 830.6321.

5. As requested in Finding No. 5 of the previous review, the data regarding Corrosion Characteristics were provided in MRID No. 492232-01. No signs of corrosion have been presented on commercial packaging material; metal can, after 12 months of storage at room temperature. The requirements of Guideline 830.6320 are satisfied.

6. As per certification letter, the Storage Stability test is underway and its result will be presented later. Meanwhile, the requirements of Guideline 830.6317 are still not satisfied.

- 7a. The Ingredients Statement on the draft label should be revised to read OTHER ingredients instead of INERT ingredients as per PR Notices 97-6.

- 7b. The Storage and Disposal Statements are acceptable in accordance with 40 CFR §156.10(i)(2)(ix) and PR Notice 83-3.

- 7c. The Physical or Chemical Hazards Statement on the draft label is acceptable.

NOTE TO PM: The Storage and Disposal Section should be evaluated for compliance with PR Notice 2007-4.

CONCLUSIONS:

After submission of data, as noted in Finding No. 6, the registrant will satisfy the product chemistry requirements for the reregistration of EPA Reg. No. **60061-128**.